

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - X
 :
 UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 KAREEM LANIER, :
 a/k/a "Reem," :
 a/k/a "Black," :
 :
 Defendant. :
 :
 - - - - - - - - - - - - - - - X

ORIGINAL

SUPERSEDING INFORMATION

S25 15 Cr. 537 (VEC)

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| USDC SDNY |
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| DOC #: |
| DATE FILED: JUN 12 2017 |

COUNT ONE

(Use of Firearm for the Murder of Dykeem Etheridge)

The United States Attorney charges:

1. On or about January 24, 2011, in the Southern District of New York, KAREEM LANIER, a/k/a "Reem," a/k/a "Black," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, LANIER's murder of Dykeem Etheridge by shooting and killing Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets in the Bronx, New York, for the purpose of maintaining and increasing LANIER's position in a racketeering enterprise styled as a street gang known as the "Young Gunnaz" or "YGz," that engaged in a pattern of violent racketeering activities including murders, attempted murders, robberies, and other crimes of violence (the "YGz Racketeering Enterprise"), in violation of

Title 18, United States Code, Sections 1959(a)(1) and 2, knowingly did use and carry a firearm, and, in furtherance of such crime of violence, did possess said firearm, which was discharged.

(Title 18, United States Code,
Sections 924(c)(1)(A)(iii), and 2.)

COUNT TWO

(Use of Firearm for the Attempted Murder of Jamel Cobbs)

The United States Attorney further charges:

2. On or about July 3, 2011, in the Southern District of New York, KAREEM LANIER, a/k/a "Reem," a/k/a "Black," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, LANIER's participation in aiding and abetting the attempted murder of Jamel Cobbs, a/k/a "Murder Mel," by encouraging and assisting another member of the YGz Racketeering Enterprise in shooting Cobbs in an attempt to kill Cobbs in the vicinity of Park Avenue and 158th Street in the Bronx, New York, for the purpose of maintaining and increasing LANIER's position in the YGz Racketeering Enterprise, in violation of Title 18, United States Code, Sections 1959(a)(5) and 2, knowingly did use and carry a firearm, and, in furtherance of such crime of violence, did possess said firearm, and did aid and abet such use, carrying, and possession of said firearm, which was discharged.

(Title 18, United States Code,
Sections 924(c)(1)(A)(iii), 924(c)(1)(C)(i), and 2.)

COUNT THREE

(Conspiracy to Participate in the YGz Racketeering Enterprise)

The United States Attorney further charges:

3. At all times relevant to this Information, KAREEM LANIER, a/k/a "Reem," a/k/a "Black," the defendant, and others known and unknown, were members of the YGz Racketeering Enterprise, a criminal organization whose members and associates engaged in, among other things, murder, attempted murder, robbery, other crimes of violence, and trafficking of narcotics including cocaine base in a form commonly known as "crack" cocaine. The YGz Racketeering Enterprise operated principally in the Bronx, New York.

4. The YGz Racketeering Enterprise, including its leadership, its membership, and its associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The YGz Racketeering Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the YGz Racketeering Enterprise. At all times relevant to this Information, the YGz Racketeering Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

5. From at least in or about 2010, up to and including in or about 2017, in the Southern District of New York and

elsewhere, KAREEM LANIER, a/k/a "Reem," a/k/a "Black," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, their conduct and participation in the affairs of the YGz Racketeering Enterprise through a pattern of racketeering activity, in violation of Title 18, United States Code, Section 1962(c).

6. It was a part and an object of the conspiracy that KAREEM LANIER, a/k/a "Reem," a/k/a "Black," the defendant, and others known and unknown, being persons employed by and associated with the YGz Racketeering Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, would and did conduct and participate in the affairs of the YGz Racketeering Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1962(1) and 1962(5), consisting of multiple acts involving murder and robbery that are chargeable under the following provisions of state law:

New York Penal Law, Sections 20.00, 125.25 and 125.27 (murder);

New York Penal Law, Sections 20.00, 110.00 and 125.25 (attempted murder);

New York Penal Law, Sections 105.15 and 125.25

(conspiracy to murder);

New York Penal Law, Sections 20.00, 110.00, 160.05 and 160.10 (robbery);

New York Penal Law, Sections 105.10, 160.05 and 160.10 (conspiracy to commit robbery); and

New York Penal Law, Sections 20.00, 110.00, 160.05 and 160.10 (attempted robbery);

multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances, including 28 grams and more of cocaine base in a form commonly known as "crack" cocaine, all in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(B), and 846, and Title 18, United States Code, Section 2; and multiple acts that are indictable under Title 18, United States Code, Sections 1951 and 2 (relating to robbery).

7. It was a part of the conspiracy that KAREEM LANIER, a/k/a "Reem," a/k/a "Black," the defendant agreed that a member of the conspiracy would commit at least two acts of racketeering in the conduct of the affairs of the YGz Racketeering Enterprise.

Overt Acts

8. In furtherance of the conspiracy and to effect the illegal object thereof, KAREEM LANIER, a/k/a "Reem," a/k/a "Black," the defendant, committed the following overt acts, among

others, in the Southern District of New York and elsewhere:

a. From at least in or about 2010 through in or about 2012, LANIER and other members of YGz Racketeering Enterprise distributed and possessed with the intent to distribute 28 grams and more of cocaine base in a form commonly known as "crack" cocaine in the vicinity of Maria Lopez Plaza by Morris Avenue and 151st Street in the Bronx, New York.

b. Between on or about August 7, 2010 and on or about November 22, 2010, in the vicinity of 150th Street near Courtlandt Avenue in the Bronx, New York, LANIER aided and abetted an attempted murder in which a fellow member of the YGz Racketeering Enterprise fired gunshots in an effort to kill an individual whom they believed to be Felipe Blanding, a/k/a "Hump," a member of a rival gang referred to herein as the "Courtlandt Avenue Crew" (the "CAC").

c. On or about January 24, 2011, LANIER, acting in concert with other members of the YGz Racketeering Enterprise, assaulted and robbed rival CAC associate Payne Brown inside a bodega located on Courtlandt Avenue near 153rd Street in the Bronx, New York.

d. On or about January 24, 2011, LANIER, acting in concert with other members of the YGz Racketeering Enterprise, assaulted Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets in the Bronx, New York.

e. On or about January 24, 2011, LANIER shot and killed Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets in the Bronx, New York.

f. On or about July 3, 2011, in the vicinity of Park Avenue and 158th Street in the Bronx, New York, LANIER aided and abetted an attempted murder in which a fellow member of the YGz Racketeering Enterprise shot rival CAC member Jamel Cobbs, a/k/a "Murder Mel," in an effort to kill Cobbs.

g. On or about July 3, 2011, while LANIER and the fellow member of the YGz Racketeering Enterprise who shot Cobbs were fleeing from the location where Cobbs had been shot, LANIER's confederate shot and killed Curtis Smith, a bystander, in the vicinity of Park Avenue between 156th and 158th Streets in the Bronx, New York.

h. On or about October 17, 2011, LANIER provided a firearm to a fellow member of the YGz Racketeering Enterprise who used this weapon in a shootout with members of a rival gang known as "18 Park" that resulted in the fatal shooting of 18 Park gang member Devon Jackson, a/k/a "Ross," in the vicinity of 346 East 146th Street in the Bronx, New York.

i. On or about December 22, 2011, after several other members of the YGz Racketeering Enterprise, acting in concert, murdered rival CAC member Taisheem Ferguson, a/k/a "Trey," near Morris Avenue and 151st Street in the Bronx, New York, LANIER

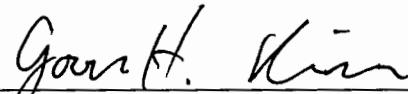
helped two of the participants in the murder flee from the scene of the murder.

j. On various occasions during the period from in or about 2010 through in or about 2012, LANIER and another member of the YGz Racketeering Enterprise committed acts of violence in the Bronx, New York, in exchange for financial compensation from an individual who was involved in the illegal distribution of prescription pills, including robbing and assaulting rival pill traffickers for this individual.

k. On or about May 1, 2012, LANIER, hit a drug customer with a gun near Maria Lopez Plaza in the Bronx, New York.

l. In or about February 2015, while LANIER was incarcerated at the Federal Correctional Institution in Fairton, New Jersey, in connection with a prior sentence, LANIER assaulted rival CAC member Javon Jones, a/k/a "Capo," who was also incarcerated at that prison.

(Title 18, United States Code, Section 371.)


JOON H. KIM MS
Acting United States Attorney

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(18 U.S.C. §§ 924(c)(1)(A)(iii),
924(c)(1)(C)(i) and 2, and 371).)

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